

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE MANAGEMENT GROUP, LLC, ANDREW  
FOX, and LEE HEIMAN. :  
:

Plaintiffs. :

- against - :

ANGEL MUSIC GROUP LTD., NEIL MOFFITT,  
NICK McCABE, JESSIE ANGLIS, ANOTHAMU,  
ISABEL PIAGGI, and DAN A. VIDAL. :  
:

Defendants. :  
----- X

08-02172(PKC)

**AFFIDAVIT OF ISABEL PIAGGI**  
**IN SUPPORT OF MOTION TO DISMISS**

STATE OF FLORIDA       )  
                                  )  
COUNTY OF DADE       )

SS:

ISABEL PIAGGI, being duly sworn, says:

1. I am a citizen of the United States and of the State of Florida. I reside at 6225 SW 87<sup>th</sup> Avenue, Miami, FL 33173. I was served with the complaint in this action on March 14, 2008.

2. The complaint against me should be dismissed for lack of personal jurisdiction. I do not live in New York. I do not own property in New York. I do not work in New York. I never contracted to deliver any good or service in New York. I did no tortious act that had an effect in New York. I transact no business in New York.

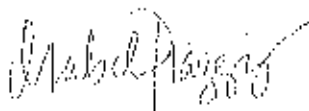
3. The complaint against me alleges a number of common-law causes of action arising out of my departure from the employment of Plaintiff The Management Group, LLC ("TMG") and my joining Defendant Angel Music Group, Ltd. ("Angel").

4. Both TMG and Angel manage musical artists on a worldwide basis. I worked for TMG from March 7<sup>th</sup>, 2005 until December 12<sup>th</sup>, 2007 as the Miami Regional Manager. I had no employment contract with TMG during my employment there. At all times during my employment with TMG I was located in the State of Florida. I delivered services to TMG from the office in Florida to its worldwide client base. I did not travel to New York for business and did not otherwise avail myself of this jurisdiction for any purpose.

5. I communicated with employees of TMG in New York and elsewhere as part of my duties, but as shown in the accompanying memorandum of law, this is insufficient to support jurisdiction in New York.

WHEREFORE, the motion to dismiss the complaint as against me should be granted.

April 7, 2008



State of Florida  
County of Dade

Sworn to for and signed and subscribed before me this 7<sup>th</sup> day of April, 2008 by Isabel Pleggi

Personally Known \_\_\_\_\_ or Proof of Identification \_\_\_\_\_  
Type of Identification Produced DL# E3780703217670

KARAHMETOGULU & LUZ FIRM LLP

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